

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

| | | |
|---------------------------|---|---------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| v. |) | CRIMINAL NO. 13-10200-GAO |
| |) | |
| DZHOKHAR TSARNAEV |) | |

**MOTION FOR LEAVE TO FILE CERTAIN EXHIBITS TO
MOTION TO COMPEL THE GOVERNMENT TO COMPLY WITH ITS
EXPERT DISLCOSURE OBLIGATIONS UNDER SEAL**

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully moves for leave to file certain exhibits to his Motion to Compel the Government to Comply with Its Expert Disclosure Obligations – specifically, the lists of FBI and Massachusetts State Police laboratory reports, along with disclosure letter accompanying them - under seal.

As grounds therefor, undersigned counsel state that the documents are not part of the public record, refer to investigative information, and are covered by the protective order in this case [DE 91].

Respectfully submitted,

DZHOKHAR TSARNAEV
by his attorneys

/s/ Timothy Watkins

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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on July 25, 2014.

/s/ Timothy Watkins